

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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IN RE:	:	Civil Action No. 90mc919
	:	MDL Docket No. 864
DONALD J. TRUMP CASINO SECURITIES LITIGATION	:	Class Action
TRUMP CASTLE AND TRUMP PLAZA ACTIONS	:	
	:	
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**AFFIDAVIT OF SHANDARESE GARR CONCERNING
REMAINING BALANCE OF SETTLEMENT FUND**

STATE OF NEW YORK)
) SS.:
COUNTY OF SUFFOLK)

Shandarese Garr, being first duly sworn, deposes and says:

1. I am the Vice President of Operations for The Garden City Group, Inc. ("GCG"), which was retained to serve as the Claims Administrator in the above-captioned litigation (the "Litigation"). I have personal knowledge of the facts stated herein.

2. On February 17, 1994, GCG provided its final report to counsel of all eligible claims and all rejected claims. The affidavit of G. Peter Buchband previously filed with the Court, more fully describes GCG's claims administration process and attaches GCG's final reports.

3. By the Order dated August 8, 1994, the Court approved the administrative determinations of GCG accepting and rejecting claims. Pursuant to that Order, GCG distributed

the Settlement Fund to Authorized Claimants on September 12, 1994. GCG issued 242 checks to Authorized Claimants in the aggregate amount of \$864,218.62.

4. After making this distribution, GCG monitored the status of claimant checks. As is our standard practice, GCG made reasonable attempts to locate the claimants whose checks remained uncashed or were returned as undelivered by the Post Office. A National Change of Address search (NCOA) was performed for claimants whose checks were returned as undeliverable from the U.S. Postal Service. Our database was updated to reflect the new addresses and new checks were reissued to those claimants. In addition, phone calls were made to claimants who had not cashed their checks in an effort to prompt them to cash their checks immediately.

5. As of October 26, 2006, 1 check remains uncashed for a total of \$368.44. In addition, 6 checks were returned to GCG as undeliverable in the amount of \$7,193.39. In addition, there was \$3,000.00 of unused reserves to cover potential tax liabilities, resulting in a total of \$10,558.90 remaining in the Settlement Fund as of December 18, 2006. Currently, all outstanding uncashed checks listed above are stale-dated.

6. Lead Counsel and GCG believe that they have used reasonable and diligent efforts to distribute the Settlement Fund, and are unable to locate the remaining claimants. It is not believed that further efforts will be effectual. As a result of the foregoing and in order to achieve finality of this settlement administration, GCG recommends the entry of an Order declaring that the claims associated with the outstanding checks that were uncashed or undeliverable be deemed invalid.

7. GCG understands that Lead Counsel will move for entry of an order directing the remaining Settlement Fund balance of \$10,558.90 to be donated equally to the Lawyers'

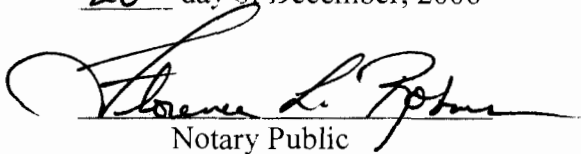
Committee for Civil Rights Under Law and the Institute for Law and Economic Policy (ILEP) or such other charity as may be designated by the Court.

8. At this time, GCG requests court-ordered authorization to discard/destroy all copies of the Proof of Claim forms with supporting documents and other correspondence, in whatever form or media they are maintained.



SHANDARESE GARR

Sworn to before me this
20th day of December, 2006



Notary Public

FLORENCE L. ROBINSON
Notary Public, State of New York
NO. 01R06142774
Qualified in Queens County
My Commission expires March 20, 2010